



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10
SEATTLE, WASHINGTON 98101

REPLY TO
ATTN: S HW-114

MEMORANDUM

SUBJECT: Review of Yakima Agriculture Research Lab Closure Plan

FROM: Bill Adams
RCRA Compliance Section

TO: Lydia Reynolds
Superfund Enforcement Branch

I have reviewed the January 20, 1987 Yakima Agriculture Research Lab (YARL) closure plan for its compliance with the RCRA requirements. The facility refers to this closure plan as a research plan to, "demonstrate that hazardous wastes are not present in amounts to constitute a threat to the environment". A closure plan in the formal and regulatory sense usually assumes some contamination is present and outlines a detailed schedule and procedures for cleanup and/or containment of the site and should include at a minimum the elements identified on the attached sheet.

I have no problems with their initial approach but they should probably refer to it as a RCRA Facility Assessment (RFA) or PA/SI instead of a closure plan. They could also use the existing plan and incorporate several closure options to be used depending on the extent and level of contamination identified.

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General Closure Requirements

1. For partial or final closure the plan must identify the steps necessary to close the unit. The steps required to close must be broken down in sufficient detail such that:
 - a) the closure process is understandable;
 - b) a closure schedule can be developed; and
 - c) quantities and unit prices can be developed for closure cost estimation.
2. The closure plan should provide an estimate of the maximum inventory of hazardous wastes on-site or disposed of in the unit and a detailed description of the methods to be used for removing, decontaminating equipment and system components, transporting, treating, storing, or disposing of all hazardous wastes.
3. The closure plan must include an estimate of the expected year of final closure.
4. Unless an exemption is granted, the waste must be treated, removed from the site or removed within 90 days after receiving approval of the closure plan. Closure must be completed within 180 days after approval of the closure plan.
5. The plan must specify that within 60 days of completion of closure the owner/operator will submit certification that the unit has been closed in accordance with the approved closure plan.
6. The closure plan must indicate the location and dimensions of any waste disposal units with respect to permanently surveyed benchmarks.
7. The closure plan must contain a detailed estimate, in current dollars, of the cost of closing the facility in accordance with the requirements of 40 CFR Part 265.
8. The closure plan must outline the criteria and methods to be used to judge the success of the decontamination and removal efforts.